

United States District Court

AUG - 5 2015

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

McAllen Division

David J. Bradley, Clerk

V.

CRIMINAL COMPLAINT

Case Number: M-15- 1311 -M

Anna Crystal PALOMA

A208 288 098

YOB: 1996

COC: United States

Name and Address of Defendant

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about August 4, 2015 in Hidalgo County, in the Southern District of Texas defendant(s) did,

knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law and brought the alien for the purpose of commercial advantage or private gain,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) & 1324(a)(2)(B)(ii)
I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

Refer to Attachment A

Continued on the attached sheet and made a part of this complaint:

☒ Yes

☐ No

Sworn to before me and subscribed in my presence,

Approved By: R. Cantu

August 5, 2015

Date

Peter E. Ormsby

U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Complainant

Juan R. Cienega

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

Attachment A

The defendant, a United States citizen and passenger aboard a taxi, attempted to bring illegally into the United States through the Pharr Port of Entry alien child R.A.M.G. (female, 4 months old), a Mexican citizen, as a United States citizen. At primary, the defendant claimed the child as her niece, that she was a United States citizen, and presented a State of Nebraska birth certificate bearing the name J.C.H. as proof. The defendant and the child were referred into secondary for further inspection.

In secondary, the defendant insisted the child was her niece and to taking the child back to her parents in Nebraska as a favor. Further inspection revealed the defendant was utilizing her friend's daughter's birth certificate to bring the child into the United States illegally. The defendant admitted to knowing the child was from Mexico and to not having any legal status to enter the United States.

According to the defendant, her friend (Adilene HERNANDEZ-Gutierrez, the child's aunt) had propositioned her into bringing her niece to Nebraska illegally as a United States citizen using her daughter's birth certificate. The defendant accepted and was provided with the birth certificate. She then flew from Cincinnati, Ohio to McAllen, Texas, traveled to Reynosa, Tamaulipas, and took custody of the child from the mother. For her services, she was to receive \$3,000.00 dollars once the child was in Nebraska with her aunt.

Contact was established with the child's mother and she arrived at the Hidalgo Port of Entry to claim her child. She corroborated the defendant's statements and admitted to her intentions of entering the United States illegally once the child was in the United States. Database queries on both resulted in no legal status to enter, live, or work in the United States. Both were returned to Mexico through the Hidalgo Port of Entry.